IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA SALISBURY DIVISION

Case No: 1:24-CV-00221

CRAIG CUNNINGHAM,

Plaintiff,

V.

WALLACE & GRAHAM, P.C., MONA LISA WALLACE, BILL GRAHAM, WHITNEY WALLACE WILLIAMS, MARK P. DOBY, RHINE LAW FIRM, P.C., JOEL R. RHINE, SOKOLOVE LAW, LLC,

Defendants.

LR 5.5 REPORT FOR THE FILING OF SEALED DOCUMENTS

The parties, consisting of the Plaintiff, Craig Cunningham, through counsel, and the Defendants, Wallace & Graham, P.A., Mona Lisa Wallace, Bill Graham, Whitney Wallace Williams, Mark P. Doby, Rhine Law Firm, P.C., Joel R. Rhine, and Sokolove Law, LLC, through counsel, hereby respectfully jointly respectfully submit the following report pursuant to LR 5.5.

The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility

of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

The parties certify that few, if any, documents will be filed under seal. The parties agree to use the default procedures of LR 5.4(c). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality as soon as practicable, but at least two (2) days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

Date: January 21, 2025.

Counsel for Plaintiff:

By: /s/ Andrew Perrong (with permission)
Andrew Roman Perrong
Perrong Law LLC
2657 Mt. Carmel Ave.
Glenside, PA 19038
215-225-5529

Fax: 888-329-0305

Email: a@perronglaw.com By special appearance

Ryan P. Duffy
The Law Office of Ruan P. Duffy PLLC
1213 W. Morehead St.
Suite 500, Unit #450
Charlotte, NC 28208
704-741-9399

Email: ryan@ryanpduffy.com

Counsel for Defendants: By: <u>/s/ Virginia Bell Flynn</u>

Virginia Bell Flynn (N.C. Bar No. 59109) TROUTMAN PEPPER LOCKE LLP 301 South College Street, Suite 3400

Charlotte, North Carolina 28202

Telephone: 704-916-1509 Facsimile: 704-998-4051

Email: virginia.flynn@troutman.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2025, I filed the foregoing document using

the courts CM/ECF system, which will automatically send notification of filing to

all counsel of record.

By: /s/ Virginia Bell Flynn

Virginia Bell Flynn

4